

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:
SANDRA MARIA DE FATIMA SEDA
BARLETTA
Debtor

CASE NO. 19-02177 MCF
CHAPTER 13

MOTION FOR WITHDRAWAL OF LEGAL REPRESENTATION

TO THE HONORABLE COURT:

COMES NOW, undersigned counsel and before this Honorable Court most respectfully states and prays:

1. Above captioned petition for relief was filed on April 22, 2019. Docket No. 1. Hearing on confirmation of payment plan has been scheduled for April 6, 2021. Docket No. 71. Debtor has been granted until March 12, 2021 to reply to Trustee's report on at docket 70. Docket No. 77.

2. Serious and unreconcilable conflicts with the case strategy and manner of prosecution of above captioned case have arisen causing a disruption in the attorney-client relationship.

3. Given the rupture in client-attorney relations regarding the management of the case strategy and prosecution of the case, undersigned counsel is not in a position to continue as legal representative for Debtor while responsibly complying with her duties to the client, this Honorable Court and other parties, as set forth in the Code of Ethics and the Bankruptcy Code and Rules. Therefore the undersigned attorney pursuant to the American Bar Association Model Rule 1.16(b) requests that this Court grant her withdrawal as legal representative for Debtor in the instant case.

4. It is further requested that Debtor be granted a period of thirty (30) days to obtain new counsel .

WHEREFORE, it is respectfully requested that this Court grant this motion for the

withdrawal of attorney Noemí Landrau Rivera and Landrau Rivera & Associates from Debtor's legal representation and grant a period of thirty (30) days for Debtor to obtain new counsel.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico this 23rd day of February, 2021.

I HEREBY CERTIFY: That a true copy of the instant motion has been forwarded via the Court electronic filing system to Chapter 13 Trustee at his registered address of record and all other parties participating in the Court's CM/ECF system. Copy of this motion has also been notified on this same day to Debtor by regular mail at 8 Calle Tapia, Ocean Park, San Juan, PR 00911.

LANDRAU RIVERA & ASSOC.

Counsel for Debtor

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